

SOCIETE FONCIERE LYONNAISE PRIVACY POLICY

To protect your privacy, Société Foncière Lyonnaise ("**SFL**") deploys its best efforts to protect the confidentiality of your personal information. The purpose of this privacy statement (the "**Privacy Policy**") is to describe how personal data (your "**Personal Data**") collected when you browse SFL's website <https://www.fonciere-lyonnaise.com/> (the "**Website**") are processed.

Your Personal Data are processed by SFL in accordance with France's Data Protection Act (Act 78-17 of 6 January 1978) and the European General Data Protection Regulation (Regulation (EU) 2016/679 of 27 April 2016 – GDPR).

ARTICLE 1 – DECLARATION RELATING TO PERSONAL DATA

Personal Data processed by SFL

Depending on your use of the Website and, more generally, your interactions with SFL, the following Personal Data may be collected and processed:

- **Identification data:** your first and last names, email address, etc.
- **Professional data:** your company, job title or role, professional contact details, etc.
- **Informational or commercial content:** the content of your messages, comments and interactions with SFL's customer services teams
- **Website traffic and utilisation data:** please refer to article 2 describing our use of cookies.

When and how Personal Data are collected by SFL

In accordance with the GDPR:

- Personal Data are collected by SFL for specified, explicit and legitimate purposes and are not further processed in a manner that would be incompatible with those purposes, **in accordance with the purpose limitation principle.**
- SFL only collects Personal Data that are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed, **in accordance with the data minimisation principle.**

On our Website, your Personal Data may be collected for example:

- In the Website's "Contact" sections
- To manage your subscriptions
- In the "Recruitment – Submit an application" section.

Purposes for which Personal Data are processed by SFL

Your Personal Data are collected and processed by SFL in its capacity as data controller, in order to:

- Provide pre-contractual information that you may request from SFL
- Enable SFL to pursue its legitimate interests, such as:

- To manage the commercial relationship with a potential or existing customer (answering a question submitted using a contact form, drawing up a quote, sending commercial offers, etc.)
- To monitor and manage recruitment via the Website's "Recruitment" section
- To ensure the Website's security and integrity
- Comply with all laws, regulations, legal requests and orders applicable to SFL.

Sharing of Personal Data by SFL

Your Personal Data are intended for SFL, which may, depending on your use of the Website, share it with the following recipients only:

- **Within SFL:** we may share your Personal Data with members and employees of SFL and its subsidiaries.
- **With external service providers:** we may communicate your Personal Data to third parties such as IT service providers, other service providers, subcontractors, etc.
- **With third parties for legal purposes:** we may disclose your Personal Data to comply with statutory or regulatory requirements, and or legal requests and orders or if permitted by law.

In all cases, third parties are required to provide sufficient privacy and security guarantees and to implement appropriate physical, organisational and technical measures for the protection and security of your Personal Data, in accordance with the applicable legislation.

We will not sell, exchange, rent or transfer your Personal Data in any other manner, without your informed consent.

Personal Data retention period

Your Personal Data will be retained by SFL for the period of time necessary to fulfil the purposes described above, except where (i) you ask SFL to erase your Personal Data before that period expires, subject to the conditions imposed by the applicable legislation, and where (ii) the law permits or requires us to retain your Personal Data for a longer period.

Purpose	Retention period
Tracking of relationship with an existing or potential customer	3 years from your last interaction with SFL
Management of job applications	2 years from your last interaction with SFL

However, if required for evidential purposes, your Personal Data may be kept for a longer period corresponding to the applicable statute of limitations.

Your rights regarding your Personal Data

In the cases provided for by law, you have the following rights with regard to your Personal Data:

- **Rights of access, rectification, updating, erasure and restriction of processing:** you may ask to access your Personal Data held and processed by SFL, consult the Data, obtain a paper or electronic copy, and request the rectification, updating or erasure of the Data or the application of restrictions concerning their processing.
- **Right to object:** you may, at any time, ask not to receive any further information or offers, either by writing to us at one of the addresses given below, or by following the unsubscription process described in the messages you receive from us. In some cases, exercising your right to object may lead to a change in the way we provide our services or in the way the Website operates, if your Personal Data are required for this purpose.
- **Right to Personal Data portability.**
- **Right to lodge a complaint with a Supervisory Authority:** without prejudice to any other legal remedy, you have the right to lodge a complaint with the supervisory authority in the European Union country of your habitual residence or place of work or place of the alleged infringement of your rights in relation to your Personal Data.

You can exercise your rights as described above by sending a signed request, together with a photocopy of your passport or ID card, to the address given in the "Contact Us" section below.

ARTICLE 2 – COOKIE STATEMENT

Definition of a cookie

Cookies are small text files stored by websites on users' computers. The information contained in cookies may be used to track your browsing history on different websites that use the same cookie. We use cookies to collect statistics on the number of visitors and to record information about your preferences when you browse our website in order to improve your user experience.

Cookies used by SFL and their purposes

We use two types of cookies depending on their purpose:

Type of cookie	Cookie name	Data retention period	Objection process
Technical cookies	Google (Recaptcha + Youtube)	24 months	None
Identification and personalisation cookies	-	-	-
Analysis and performance cookies	Matomo	13 months	None
Advertising or targeting cookies	-	-	-

Purpose:

- Technical cookies:

These cookies are used to optimise your browsing preferences and improve your browsing experience during a session. Some cookies are essential to the operation of this Website. Consequently, if you refuse to accept these cookies you may be blocked from accessing certain services or experience access difficulties.

- Audience measurement cookies:

These cookies are used to produce statistics about the number of visitors to the Website and how it is used. These statistics are then analysed to improve the way that visitors use the Website, make the browsing process more efficient and enhance the site's functions.

ARTICLE 3 - MODIFICATION OF THE PRIVACY POLICY

SFL reserves the right to make changes to the Privacy Policy at any time. We encourage you to consult the "Legal notices" page regularly to check for any changes and to stay informed about the measures we take to protect your Personal Data. You acknowledge and agree that it is your responsibility to check our Website regularly for any modifications to the Privacy Policy and any other changes.

ARTICLE 4 - CONTACT US

To exercise your rights or if you have any questions about the Privacy Policy, please contact us:

- By letter, sent to SFL, 42 rue Washington, 75008 Paris, France; and/or
- By email, sent to sfl@fonciere-lyonnaise.com

This Privacy Policy was updated on 13 September 2024.